

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:)	
)	Chapter 11
)	
MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> ,)	Case No. 23-00623 (TJC)
)	
Debtors.)	Jointly Administered
)	
)	

**[PROPOSED] ORDER GRANTING DEBTORS' EXPEDITED MOTION FOR ENTRY
OF ORDER WAIVING LOCAL RULE 3020-1**

Upon the motion (the “Motion”)¹ of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (this “Order”) waiving the requirements of Local Rule 3020-1 and setting a hearing on confirmation of the Combined Disclosure Statement and Plan on May 16, 2024 (the “Confirmation Hearing Date”), regardless of whether there are objections to the Combined Disclosure Statement and Plan, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Public Administrative Order* referring bankruptcy cases entered by the United States District Court for the Northern District of Iowa; and this Court being able to enter a final order consistent with Article III of the United States Constitution; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for

¹ Capitalized terms used but not defined herein have the meanings given to such terms in the Motion.

the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth in this Order.
2. The Court finds that good cause exists to waive the requirements of Local Rule 3020-1 and hold the final hearing to consider confirmation of the Combined Disclosure Statement and Plan on the Confirmation Hearing Date regardless of whether there are objections to confirmation of the Combined Disclosure Statement and Plan.
3. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated and entered this ____ day of _____, 2024.

Honorable Thad J. Collins, Chief Judge

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